

EXECUTIVE SUMMARY

The Department of Energy (DOE) is pursuing an Interim Measure/Interim Remedial Action (IM/IRA) at the 903 Pad, Mound, and East Trenches Areas (Operable Unit No. 2) at the Rocky Flats Plant (RFP). This IM/IRA is to be conducted to minimize the release from these areas of hazardous substances that pose a potential threat to the public health and environment. The Plan involves the collection of contaminated surface water, treatment by chemical precipitation, cross-flow membrane filtration and granular activated carbon (GAC) adsorption, and surface discharge of treated water. Complete information is presented in the document entitled "Proposed Interim Measures/Interim Remedial Action Plan and Decision Document, 903 Pad, Mound, and East Trenches Areas, Operable Unit No. 2" (IM/IRAP) dated 26 September 1990. Information concerning the proposed Surface Water IM/IRA was presented during a public meeting held from 7 to 10 p.m., Tuesday, 23 October 1990, at the Westminster City Park Recreation Center in Westminster, Colorado.

This Responsiveness Summary presents DOE's response to all comments received at the public meeting, as well as those mailed to DOE during the public comment period which ended 24 November 1990. There were a number of technical comments on the plan that DOE has addressed herein. It is noted that several major issues were raised by the comments. Of particular note is the objection to the interbasin transfer of contaminated Woman Creek surface water to the South Walnut Creek drainage. In the IM/IRA Plan, it is proposed to collect seeps southeast of the 903 Pad in the Woman Creek drainage. The seepage would subsequently be transported by pipeline or tanker truck to a centrally located treatment facility discharging to the South Walnut Creek drainage.

The Woman Creek seeps are in an area of surface soil plutonium contamination. However, the risk assessment presented in Section 7.6.3 indicates radiation exposure to workers and the public from construction of seep collection sumps and truck transport of collected water is 200 times lower than acceptable airborne exposure limits to any member of the general public. These risk estimates are conservative, since they are based on the absence of any dust suppression techniques. Dust suppression will be implemented, as described in Section 7.1.

Regardless of the estimated low risk to the public from construction and water transport activities, the popular sentiment of the public, based on comments received, is strong concern over worker and public health risks from these activities. The City of Broomfield is strongly opposed to transfer of plutonium contaminated water from the Woman Creek drainage to the South Walnut Creek drainage based on their stated uncertainty as to the IM/IRA treatment facility performance with respect to radionuclide removal. In addition, the City of Westminster finds construction activities in the Woman Creek drainage to be unacceptable until the Option B interceptor canal is constructed.

In light of these public and municipal concerns, DOE proposes to modify the IM/IRA Plan of 26 September 1990 so that Woman Creek seepage will not be transferred to the South Walnut Creek drainage. DOE proposes to postpone the collection of Woman Creek seeps until the bench scale treatability tests have been completed. These tests have been delayed because the seeps have been dry and no sample has been available for testing. It is expected that seep water will be available in March 1991. By allowing adequate time for testing, data interpretation and preparation of reports, an addendum to the IM/IRA Plan can be completed during the summer of 1991. The treatment and discharge options to be evaluated and proposed in this addendum would not include the transfer of either treated or untreated water from the Woman Creek drainage.

The IM/IRA treatment facility at South Walnut Creek is expected to achieve chemical-specific Applicable or Relevant and Appropriate Requirements (ARARs). Even in the event that the results of the treatability studies indicate that it is not practical to fully attain some of the ARARs, a reduction in the contaminants present will still be realized by treatment. Treatment will also assist current actions to achieve State Segment 4 Walnut Creek standards before discharge.

Additional interceptor canal projects as commented upon by Westminster are the subject of separate negotiations between Department of Energy and the cities; these negotiations are not being reported on in this

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document. Whether or not the canal is in place at the start of construction of this IRA, DOE is fully committed to execution of the project in a safe and reliable manner. The OU 2 IM/IRA, is being carefully planned in conjunction with the EPA and CDH to ensure an effective and safe action and to ensure that all necessary environmental monitoring will accompany remediation.

There are several issues where multiple comments were received by the public. These issues include the following:

- Generation of plutonium contaminated dust, and worker and public health and safety
- ARARs (selection and attainment)
- Treatability studies
- Monitoring
- IM/IRA system operation/performance
- Zero discharge concept
- Community relations (and document availability)
- Tank truck transport of surface water

Responses to these and other issues are included in the document.